

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Franklin W. Olin College of Engineering

D.T.E. 01-95

**OLIN COLLEGE
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS TO
NSTAR ELECTRIC AND GAS CORPORATION**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the recipient or to any individual or entity sponsoring testimony or retained by the recipient to provide information, advice, testimony, or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These Requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what type of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input, (c) a description of the recordation system employed (including descriptions, flow charts,

etc.), and (d) the identity of the person who was in charge of the collection of the input materials, the processing of input materials, the databases utilized, and the programming to obtain the output.

8. The terms used interchangeably within these information requests relating to “any and all”, “documentation”, “support”, and “justification” mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
9. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records, microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
10. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, and if such response has been provided to Olin College to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
11. If the recipient cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the recipient cannot answer the Request in full, and state what information or knowledge is in the recipient’s possession concerning the unanswered portions.
12. If, in answering any of these Document and Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set for the language you feel is ambiguous and the interpretation you are using to respond to the Request.
13. If a document requested is no longer in existence, identify the document, and describe in detail the reasons why the document is unavailable.
14. Provide copies of all requested documents.
15. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and

the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

16. Each request for information includes a request for all documentation which supports the response provided.
17. Provide two copies of each response with all attachments: one to Eric J. Krathwohl as specified on the service list and one to Stephen P. Hannabury, Vice President Administration and Finance, Olin College, 1735 Great Plain Avenue, Needham, MA 02492-1245. In addition to the required paper copies of the responses to information requests (and any associated attachments), please provide a copy of the response (and where possible, any attachments) by email to Eric J. Krathwohl, ekrathwohl@richmaylaw.com and Stephen Hannabury, Stephen.Hannabury@olin.edu.
18. Please provide answers as they are completed.
19. Reference in the information requests to NSTAR shall include Boston Edison Company d/b/a NSTAR Electric and Gas or any other affiliate or predecessor company.

- OC-1-1 Please identify all cases of customers, wholly or partially located in the NSTAR service territory, which take electric or gas service from a utility with an adjacent utility ("borderline customers"). For each case:
- a. specify in full detail any arrangement with the customer.
 - b. specify in full detail any arrangement with the adjacent utility.
 - c. specify whether NSTAR or the adjacent utility provide the delivery of electricity of gas.
 - d. specify whether NSTAR or the adjacent utility provide the supply of electricity of gas.
- OC-1-2 Please identify and describe all records NSTAR creates and/or maintains that relate to service interruptions or voltage variations.
- OC-1-3 Please provide all of NSTAR's records regarding interruption of service or variations in voltage of more than 5% for the period 1996 – 2002:
- a. to the buildings located at 1735, 1763, 1795 and 1809 Great Plain Avenue, Needham, and 36 Curtis Road, Needham.
 - b. to all customers on circuits 148 H4 and 148 H1.
 - c. to all customers served from substation 148.
 - d. to all customers on circuits serving the portion of Needham located to the west of Central Avenue, including all customers on Central Avenue.
- OC-1-4 With respect to the interruptions or voltage variations set forth in response to OC-3 and the outage that occurred January 27, 2002, please provide a full and detailed explanation of:
- a. the cause of the interruption or voltage variation.
 - b. the extent or duration of the interruption or voltage variation.
 - c. the actions taken by NSTAR to remedy the interruption or voltage variation.
 - d. the actions taken by NSTAR to prevent the recurrence of the interruption or voltage variation.

- OC-1-5 Please compare NSTAR's performance with respect to interruptions and voltage variations on the portions of its system listed in OC-3, compared to:
- a. NSTAR's system average.
 - b. other Massachusetts electric utility companies.
 - c. any industry average.
- Such comparison should address:
- (i) frequency of such interruptions or variations.
 - (ii) duration of such interruptions or variations.
- OC-1-6 Please provide all written documentation and correspondence between NSTAR and Olin College since January 1, 1998, including letter, emails and notes of meetings or phone conversations.
- OC-1-7 Please provide a detailed description of the calculation and implementation of the "revenue credit" NSTAR provides for new customers where new facilities are required to provide service to such a customer.
- OC-1-8 For each of the five distribution facilities options and the associated installation costs that were submitted to Olin College in June, 2001, please provide the amount of revenue credit that would be applied to Olin College for different ranges of electric revenue to NSTAR. For example, if NSTAR revenue is between \$0 and \$X, the revenue credit will be \$A; if NSTAR revenue is between \$X and \$Y, the revenue credit will be \$B, etc. Please provide these figures for the first, second, third and fourth years after installation of such facilities.
- OC-1-9 To the extent not provided in the response to OC-6, please provide all records of date and time of receipt of complaints by Olin College regarding voltage fluctuations and/or outages; the time and substance of NSTAR's responsive communication; and the time and substance of NSTAR's actions to remedy the problem.
- OC-1-10 Please provide copies of any descriptions, engineering drawings or other documentation regarding potential distribution facilities to provide permanent electric service to the portion of Olin College's campus now under construction.
- OC-1-11 With respect to each of the distribution facility options specified in response to OC-10, specifically those that Olin College will be required to pay for, please

state whether those upgraded or new facilities will be dedicated to providing service to Olin College or if they will be used to provide service to other customers. If they will be shared with other customers, please indicate the relative portion of each service that will be used by Olin College and by others and what bill credits will be given to Olin for any such shared use.

- OC-1-12 With respect to each of the distribution facility options specified in response to OC-10, please state the time required from ordering to installation to full activation.
- OC-1-13 Please provide the specifications of the switchgear that NSTAR would require Olin College to install to take service from NSTAR.
- OC-1-14 Could Olin College take service from NSTAR using switchgear generally referenced as S&C System II switchgear. If the answer to the foregoing is negative, please explain why not in detail. Further, please explain in detail the difference between the NSTAR system and that of WMLP such that the S&C System II switchgear would work for one but not the other.
- OC-1-15 If NSTAR would require custom switchgear, please explain why.
- OC-1-16 If NSTAR would require fault filter fuses in entrance bays, please explain why.
- OC-1-17 If NSTAR would require side switch handles on feeder bay switches, please explain why.
- OC-1-18 If NSTAR would require custom barriers, please explain why.
- OC-1-19 Please provide a map of the portion of Needham [North] of Great Plain Avenue and [West] of Central Street and extending to the town line of Wellesley (i.e., the area covering the Olin College campus), showing all NSTAR facilities.
- OC-1-20 Did NSTAR ever have distribution facilities in the area covered by the map provided in the response to OC-1-19 beyond those indicated on such map.
- OC-1-21 Please provide a copy of the document through which NSTAR was granted a franchise to provide electric service to the entire Town of Needham.
- OC-1-22 With respect to the January 31, 2002 outage that required Northeastern University to cancel all its classes, please provide a full and detailed description of the following:
- a. the cause of the interruption.

- b. the extent or duration of the interruption.

- c. the actions taken by NSTAR to remedy the interruption.
- d. the actions taken by NSTAR to prevent the recurrence of the interruption.
- e. the compensation provided (or that will be provided) to Northeastern by NSTAR for the loss of service and other damages
- f. the representations to Northeastern by NSTAR with respect to the level of reliability of service that was available.

OC-1-23 Please state all charges that Olin would have to pay to take service from NSTAR, including, but not limited to, both non-recurring charges for physical facilities or otherwise, all charges imposed on a per kwh basis; and demand and customer charges. Please provide a specific explanation of each portion of such charges.

OC-1-24 For the portion of Needham west of and including Central Avenue, please provide:

- a. A list of all system upgrades and improvements made since January 1, 1998 with a description of each upgrade or improvement, as well as the purpose and effect thereof.
- b. A list of all system upgrades and improvements that are planned or scheduled with a description of each upgrade or improvement and the expected date of completion for each.
- c. A list of all system upgrades and improvements considered by NSTAR but which have not been planned or scheduled.
- d. To the extent not covered by the responses to a., b. and c., please provide the requested information for circuits 148H4 and 148H1 and for the portion of the system fed by substation 148.

OC-1-25 Please provide a copy of the ABB Consulting report on causes of "power outages" that was recently referenced in press coverage of NSTAR's performance in terms of service outages.

OC-1-26 Please provide a copy of any internal documentation, reports, analyses, memoranda or correspondence regarding service reliability, outages, condition of the distribution system or potential changes to the distribution system for the area addressed in OC-1-24.

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